# UNITED STATES DEPARTMENT OF THE INTERIOR NATIONAL PARK SERVICE

## RECORD OF DECISION

Final Supplement to the
RESOURCES MANAGEMENT PLAN
AND FINAL ENVIRONMENTAL IMPACT STATEMENT
FOR

IMPROVEMENT OF WATER QUALITY
AND CONSERVATION OF RARE SPECIES AND THEIR HABITATS
ON SANTA ROSA ISLAND

## CHANNEL ISLANDS NATIONAL PARK SANTA BARBARA COUNTY, CALIFORNIA

#### INTRODUCTION

Pursuant to the National Environmental Policy Act of 1969, Public Law 91-190, and the regulations promulgated by the Council of Environmental Quality at 40 CFR Part 1500, the Department of Interior, National Park Service (NPS) has prepared the following Record of Decision on the Final Supplement to the Final Environmental Impact Statement for the Resources Management Plan for Improvement of Water Quality and Conservation of Rare Species and Their Habitats on Santa Rosa Island (Final Supplement).

This Record of Decision is a concise statement of what decisions were made, what alternatives were considered, the basis for the decision, and the mitigating measures developed in order to avoid or minimize environmental impacts.

In August, 1995, the National Park Service began developing a resources management plan for Santa Rosa Island, in order to address impacts from the present commercial ranching and hunt operations on water quality, riparian values, and rare plant species and their habitats. After an initial public scoping period, NPS prepared and distributed for public review a draft resources management plan and environmental impact statement (Draft RMP/EIS) in May 1996. During a public review period of 125 days, NPS received over 240 comments on the draft plan. The NPS subsequently revised the draft RMP/EIS and addressed all substantive comments in a Final RMP/EIS, released in April, 1997. In a Record of Decision (ROD) signed in July, 1997, NPS stated that it would implement the actions described in the Proposed Action, Alternative D, Revised Conservation Strategy, of the Final RMP/EIS.

Subsequently, NPS began negotiations among NPS, Vail & Vickers, and the National Parks and Conservation Association (NPCA) in order to resolve two lawsuits that were filed against NPS during the RMP/EIS process. The three parties began meeting in July, 1997 to explore settlement options. After months of negotiations, the parties agreed to a new management plan for cattle, horses, deer and elk, subject to the completion of the Final Supplement. This new alternative was presented as Alternative F, Negotiated Settlement, in a Draft Supplement to the Final RMP/EIS. The Draft Supplement was released for public review in February, 1998. After consideration of public review on the Draft Supplement, NPS issued a Final Supplement in May 1998.

#### DECISION

The NPS will implement the actions contained in the Proposed Action, Alternative F, in the Final Supplement issued in May, 1998. The actions to be implemented are described below in the SELECTED ACTION section.

#### SELECTED ACTION

Under Alternative F, Negotiated Settlement (the Proposed Action), water quality and riparian values would be improved and rare plants and their habitats would be conserved by a rapid removal of cattle and a phased removal of deer and elk from Santa Rosa Island. With the exception of 12 head in Lobo Pasture, all cattle will be removed from the island by the end of 1998. Deer and elk will be removed by the end of 2011, although they could be removed earlier if necessary to achieve recovery goals for selected listed species and their habitats. After an initial reduction in deer and elk, an adaptive management program for deer and elk will be implemented. Under adaptive management, deer and elk will be managed at levels which would allow rare species and their habitats to recover. Provided recovery goals are met, Vail & Vickers will be allowed to conduct commercial hunting of deer and elk. After the adaptive management period, deer and elk populations will be eliminated during a final phaseout period. If, for some reason, an acceptable adaptive management program cannot be developed, deer and elk populations will be reduced at a pre-determined rate. The Park will implement road management actions to reduce impacts to island streams, and will develop a comprehensive alien plant management plan to address problems caused by alien species. The Park will develop monitoring programs for rare species, water quality and riparian recovery. Visitor access to Santa Rosa Island will be increased beyond current levels.

## ALTERNATIVES CONSIDERED

Five alternatives to the selected action (Alternative F, Negotiated Settlement) were considered and evaluated in the draft and final RMP/EIS, and the draft and final Supplement. These were:

• Alternative A (No Action)
Alternative B (Minimal Action)
Alternative C (Targeted Action),
Alternative D (Revised Conservation Strategy), and
Alternative E (Inumediate Removal of Ungulates)

Under Alternative A, No Action, the continuance of the status quo, NPS would take no action to improve water quality or riparian values, or to promote the conservation of rare species, beyond those actions which have already been taken to date. Livestock and game species would be managed as they have been in the past. Cattle would continue to graze under a continuous use system, and use of riparian areas would continue to be heavy at times. The alien plant management program would be increased as funding allows, in order to address ongoing and future alien plant problems on Santa Rosa Island. All grazing and hunting operations would cease by 2011.

Alternative B, Minimal Action, includes management actions least likely to affect operations of the grazing and hunting permittee, but that would achieve limited improvements in water quality in three pastures, and in six of the island's 16 streams. This would be accomplished by the immediate closure of Old Ranch Pasture to cattle use, and the construction of small riparian exclosures (20 to 80 acres in size) in drainages in three other pastures. The exclosures would protect about 0.75 miles, or 20% of Arlington Canyon riparian corridor, and 0.75 miles, or 30% of the Canada Tecolote riparian corridor. Grazing and browsing pressure on some rare plants and habitats would be reduced by the closure of Old Ranch Pasture and the removal of the island's deer herd over a five year period. The alien plant management program would be increased as funding allows, in order to address ongoing and future alien plant problems on Santa Rosa Island.

Alternative C, Targeted Management Action, is the implementation of a combination of management actions intended to achieve significant improvement in water quality in two pastures and in eight of the island's 16 streams. This would be accomplished by the closure of Old Ranch Pasture to cattle and horses, and the implementation of rotational grazing in North Pasture. The latter would be split by construction of a fence along the Smith Highway, and the riparian areas in the lowland areas (Brockway Pasture) would not be grazed during the hot season. To facilitate summer grazing in the upland portion of North (Black Mountain Pasture), three water developments would be constructed. Cattle would continue to have access to the island's other riparian areas. Grazing and browsing pressure on some rare plants and habitats would be reduced by the closure of Old Ranch Pasture and the removal of the island's deer herd over a three year period, as well as the reduction in the island's elk herd from 1100 to 450 animals. Small riparian exclosures would be used as restoration tools and to protect key riparian resources. Residual Dry Matter (RDM) standards would be raised to protect upland areas. The alien plant management program would be increased as funding allows, in order to address ongoing and future alien plant problems on Santa Rosa Island.

Alternative D, Revised Conservation Strategy, would improve water quality, protect riparian habitat areas, and conserve rare species and their habitats on Santa Rosa Island by phased reduction of cattle grazing and commercial hunting over the next 14 years. Management actions would include the immediate closure of Old Ranch and Carrington pastures to cattle and horses, and rapid phased reduction of grazing in other pastures with resources at risk (Pocket Field and North Pastures). Cattle exclosures, of approximately 40 acres in size, would be built to protect riparian areas in Jolla Vieja Canyon (South Pasture) and Box Canyon Springs (Wire Field Pasture). Deer would be removed from the island by the year 2001, and elk would be reduced over the next 14 years. The Park would implement road management actions to reduce impacts to island streams, and would develop a comprehensive alien plant management plan to address problems due to these species. The Park would develop monitoring programs for rare species, water quality and riparian recovery. Visitor access to Santa Rosa Island would be increased beyond current levels.

Under Alternative E, Immediate Removal of Ungulates, the permittee would be required to remove all livestock, including cattle, horses, deer, and elk, from Santa Rosa Island within three years. This would allow for rapid recovery of riparian areas and improvement in water quality in all drainages, and would remove all grazing and browsing pressure from rare plant species and their habitats. The alien plant management program would be increased as funding allows, in order to address ongoing and future alien plant problems on Santa Rosa Island.

## BACKGROUND TO RANCHING ON SANTA ROSA ISLAND

Channel Islands National Park was created by Federal statute (16 U.S.C. § 410ff) in 1980. At the time, Santa Rosa was privately owned. The Park's enabling legislation required the Secretary of the Interior to acquire Santa Rosa Island as expeditiously as possible. The legislation also authorized the private owners to retain either a reservation of use and occupancy over all or a portion of the island for a term not to exceed 25 years, or to enter into a lease agreement with the NPS. If the owners retained a reservation of use and occupancy or a lease, the legislation further specified that the former owners could continue their existing activities, provided those activities were not incompatible with the administration of the Park or the preservation of park resources. However, these conditions do not apply to the present situation because the former owners did not request a reservation or a lease for their ranch operation. In 1986, the private owners sold the entire island in fee simple to the United States, with the exception of approximately 8 acres. The former owners retained a 25-year, non-commercial reservation of use and occupancy over this small area which contains the ranch house and a nearby field. The Park has authorized continuation of the ranch and commercial hunting operations under successive 5-year special use permits. The NPS may issue permits for such operations pursuant to the NPS Organic Act and NPS regulations.

## BASIS FOR DECISION

In choosing a proposed action for this final supplement to the RMP/EIS, the NPS sought to select an alternative that would meet the goals and objectives of the plan and comply with applicable laws, regulations and policies, while protecting the core interests of the negotiating parties.

## Grazing Management

The NPS Organic Act (16 U.S.C. § 3) states that the NPS may allow grazing within units of the National Park System provided that the use is not detrimental to the primary purpose for which the park was established. In parks where NPS authorizes ranching pursuant to 16 U.S.C. § 3, the NPS issues a permit for the activity. The issuance of permits is based on criteria found in NPS' regulations and policies, including 36 C.F.R. § 1.6. Those criteria allow park superintendents to authorize activities which would be otherwise prohibited, provided that the permitted activities do not adversely impact park resources, facilities, management responsibilities, or public health and safety.

National Park Service management policies address management of grazing where it occurs in NPS units (NPS 1988, 8:14), stating that grazing will be managed in accordance with standards and procedures designed to ensure that it does not result in significant damage to park resources. The NPS will determine the significance of the impacts from grazing activities based upon the Organic Act, the park's enabling legislation, other applicable legislation, and the values and purposes of the park. Livestock will be kept within the carrying capacity of the area to be grazed so that the composition, condition, and distribution of native plant and animal communities and ecosystem dynamics are not significantly altered and so that conflicts with public use are minimized. To protect park resources, restrictions may be placed on class and numbers of animals and locations and periods of use.

The National Park Service's Natural Resources Management Guideline states that grazing systems should include the use of best management practices (NPS-77 (NPS 1991, 3:11). NPS-77 also

states that grazing management systems for other multiple-use lands may be inappropriate for managing grazing in National Park Service units (NPS 1991, 3:11).

Guidance for grazing management is also provided by the Park's general management plan (NPS 1984, 1985). The GMP directs that ranching and other commercial activities on Santa Rosa be phased out following acquisition of the island by the NPS, with retention of a small demonstration ranch near Beecher's Bay. The GMP rejected a no-action alternative which would have allowed ranching to continue on Santa Rosa Island, and also rejected management scenarios which would have allowed large numbers of cattle to remain on Santa Rosa Island.

## Rare Species Management

Section 7(a)(4) of the Endangered Species Act requires Federal agencies to confer with USFWS on any action that is likely to jeopardize the continued existence of species proposed for listing as endangered or threatened. If proposed species are subsequently listed, the Federal agency must review the action to determine if formal consultation under Section 7(a)(2) is required.

National Park Service management policies (NPS 1988) state that the NPS should identify and promote the conservation of all Federally listed threatened, endangered and candidate species within park boundaries. The management policies state that management actions should emphasize removal of threats, but also include active recovery efforts, and that management should be done in an ecosystem context. NPS-77 directs NPS to ensure that park operations do not adversely impact endangered, threatened, candidate, or sensitive species and their critical habitats, within or outside the park.

# Water Quality Management

The Clean Water Act includes a limited waiver of sovereign immunity which requires Federal agencies to comply with certain federal, state and local laws and regulations relating to water quality. In 1989, the Central Coast Regional Water Quality Control Board published water quality standards and criteria for surface waters in Santa Barbara County, in the Water Quality Control Plan for the Central Coast Region (commonly referred to as the "Basin Plan") (Regional Water Quality Control Board, Central Coast Region 1989). In a 1994 amendment to the Basin Plan, the Board identified nine specific surface waters on Santa Rosa Island and assigned to them beneficial uses, to be protected.

On May 17, 1995 the Central Coast Regional Water Quality Control Board issued a Cleanup or Abatement Order (CAO 95-064) to Channel Islands National Park directing the Park to take measures which would improve water quality on Santa Rosa Island. The Cleanup or Abatement Order stated that the Park was in violation of the Basin Plan due to current range and road management practices which allow the discharge of bacteria and sediment into the surface waters of Santa Rosa Island. Specifically, the Order directed the Park to abate rangeland and road management practices which degrade riparian habitat, degrade water quality, and induce sediment transport into surface waters of Santa Rosa Island. The Order was amended several times, and the most recent amendment was issued on March 25, 1996. The Park has agreed to implement various actions to improve water quality.

## Settlement Negotiations

The proposed action, Alternative F, Negotiated Settlement, resulted from negotiations among the National Park Service, Vail & Vickers, and the National Parks and Conservation Association (NPCA). These negotiations were convened to resolve two lawsuits that were filed against NPS during the RMP/EIS process. The first lawsuit (NPCA v. Kennedy) was filed by NPCA against the NPS. This suit alleged that the NPS' management of the Vail & Vickers cattle, deer and elk operation did not protect Park resources adequately. Vail & Vickers ultimately intervened in this suit. Vail & Vickers also filed a separate lawsuit (Vail et al. v. Galvin) after the NPS issued the July, 1997 ROD. This suit alleged that the NPS' decision to implement Alternative D violated an agreement between the NPS and Vail & Vickers under which Vail & Vickers argued they could continue their operation until 2011. NPCA intervened in this suit. The three parties to these lawsuits began meeting in July, 1997 to explore settlement options. After months of negotiations, the parties agreed to a new management plan for cattle, horses, deer and elk, subject to the NPS' compliance with the National Environmental Policy Act (NEPA) process. The management plan developed by the parties during negotiations is embodied in Alternative F, Negotiated Settlement.

Compatibility of the Alternatives with Laws, Regulations and Policies, and the Negotiated Settlement

Of the six alternatives considered in the final supplement to the Final RMP/EIS, Alternative F, Negotiated Settlement, best achieves the goals and objectives of the plan, while complying with the laws, regulations and policies listed above, with the least impact on Park operations, and while also protecting the core interests of the negotiating parties.

Implementation of Alternative A, No Action, would not achieve the goals of the plan. Alternative A does not implement any reduction in the numbers of deer, elk, cattle or horses on the island, nor does it implement any measures to mitigate the impacts of ungulates on island resources. As a result, implementation of no action would continue existing impacts to resources, and therefore would not achieve the stated goals of the plan, which are to conserve and restore rare species and habitats; protect and recover riparian habitat and water quality; and to ensure that non-native plant species do not threaten restoration of rare species and their habitats.

Implementation of Alternative B, Minimal Action, would only partially achieve the goals of the plan. Implementation of minimal action would partially conserve and restore rare species by closing Old Ranch Pasture to cattle grazing and by removal of deer within five years. However, impacts from elk would continue islandwide, and impacts of cattle on rare species in Carrington and Pocket Field pastures would continue unabated. Riparian and water quality values would improve in six of the island's 16 streams, but only within the small riparian exclosures to be constructed. Other cattle impacts to water quality and riparian areas would continue unabated until cattle were removed in 2011. Based upon consultation with the Regional Water Quality Control Board, the Park would likely not be in compliance with the Cleanup or Abatement Order. Because the levels and distribution of non-native ungulates allowed under Alternative B, Minimal Action, would result in continued adverse impacts to rare species, water quality, and riparian areas, and because this alternative does not fully meet NPS objectives, the NPS has decided not to adopt this alternative.

Implementation of Alternative C, Targeted Management Action, would only partially achieve the goals of the plan. Implementation of this alternative would partially conserve and restore rare species by closing Old Ranch Pasture to cattle grazing and by removal of deer within three years and the reduction of the island's elk herd to half its present size. However, impacts of cattle on rare

species in Carrington and Pocket Field pastures would continue unabated. Riparian and water quality values would improve in eight of the island's 16 streams, but only within the small riparian exclosures in several pastures, and in Brockway only if higher seasonal stocking rates do not hinder recovery of riparian vegetation. Other cattle impacts on water quality and riparian areas would continue unabated until cattle are removed in 2011. Based on consultation with the Regional Water Quality Control Board, the Park would likely not be in compliance with the Cleanup or Abatement Order. Higher seasonal stocking densities in some areas may result in increased cattle impacts on rare species and habitats in those areas. Because the grazing allowed under Alternative C, Targeted Management Action, would result in continued adverse impacts to rare species, water quality, and riparian areas, and because this alternative does not meet NPS' objectives, NPS did not select this alternative.

Although implementation of Alternative D, Revised Conservation Strategy, would achieve the goals and objectives of the plan while fully complying with relevant laws, regulations and policies, it would not comply with the terms of the negotiated settlement. Implementation of the proposed actions in Alternative D would gradually remove the influence of non-native ungulates from the island's natural systems, thus allowing these systems to begin recovery from grazing and browsing, and would allow NPS to cope with any problems arising from ungulate removal (such as changes in the distribution of alien plant species) in an orderly fashion. The relatively quick reduction of deer would mitigate the disproportionate influence that deer exert on sensitive biological communities and rare species. Reduction of livestock stocking levels in certain areas would confer immediate protection on rare species and native plant communities, to initiate recovery of systems, and to achieve rapid recovery of riparian function and improvement of water quality in the targeted areas. Reduction of stocking levels would allow recovery of the low-nutrient systems that enable rare plant species to compete with invasive alien species. However, Alternative D does not comply with the terms of the negotiated settlement, which calls for the rapid removal of cattle and adaptive management of deer and elk.

Implementation of Alternative E, Immediate Removal of Ungulates, would also achieve the goals of the plan, and would enable the Park to comply with applicable laws, regulation and policies, but would not comply with the terms of the negotiated settlement. Removal of all ungulates within three years would bring about rapid recovery of riparian areas and improvement of water quality in all drainages, and would remove all grazing and browsing pressure from rare plant species and their habitats. However, removal of all ungulates by the permittee within three years would require continuous removal efforts on the island, with restrictions on visitor use necessary to protect public health and safety. Under such a short removal schedule, the Park would have to monitor removal efforts to ensure no impact to Park resources. This would severely tax the Park's administrative and operational resources, and would compromise the Park's ability to manage and monitor other natural and cultural resources at the Park. Additionally, Alternative E does not comply with the terms of the negotiated settlement, which calls for the rapid removal of cattle and adaptive management of deer and elk.

Implementation of Alternative F, Negotiated Settlement, would achieve the goals and objectives of the plan while fully complying with relevant laws, regulations and policies, and with the terms of the negotiated settlement. Implementation of the proposed actions in Alternative F would progressively remove the influence of non-native ungulates from the island's natural systems, thus allowing these systems to begin recovery from the perturbations caused by many years of grazing and browsing. This would allow the re-establishment of natural ecosystem processes such as nutrient cycling and fire. Although a gradual removal of cattle would be preferable for some

resources to the rapid removal contained in the proposed action, many other resources would benefit from the immediate and total removal of cattle. The permittee has the legal right to cease the cattle ranching operation at any time, and has chosen to do so. The NPS is unable to prevent such a termination of their operation. Any negative effects of the immediate termination of grazing, such as increased abundance of some weedy species, will be offset by the beneficial effects of immediate removal of cattle. Rapid removal of cattle would remove the dominant impact on riparian areas and water quality, and would also allow recovery of the low-nutrient systems that enable rare plant species to compete with invasive alien species. Under adaptive management, acceptable deer and elk numbers would be directly tied to recovery criteria for indicator species of rare plants, thus ensuring protection and recovery of rare species and their habitats. Implementation of Alternative F would fully achieve the plan goals of protection and recovery of rare species and habitats, and riparian and water quality values. Alternative F also fully complies with the terms of the negotiated settlement, which calls for rapid removal of cattle and adaptive management of deer and elk.

Implementation of Alternative F will fully comply with National Park Service Management Policies regarding management of grazing, rare species and water quality. Under Alternative F, the rapid removal of cattle will not result in significant damage to park resources, and will bring about recovery of the composition, condition, and distribution of native plant and animal communities and ecosystem dynamics. Cattle grazing in riparian areas would cease, thus protecting and recovering water quality and riparian values. Additionally, the rapid removal of cattle will minimize conflicts with public use. Implementation of Alternative F complies with the Park's general management plan, which directs that ranching and other commercial activities on Santa Rosa be phased out.

Implementation of Alternative F will fully comply with National Park Service management policies and guidelines for managing both listed and candidate species. As the policies and guidelines direct, management of rare species under Alternative F emphasizes removal of threats, and also includes active recovery efforts, and management in an ecosystem context.

Implementation of Alternative F will fully comply with the Cleanup or Abatement Order issued by the Central Coast Regional Water Quality Control Board. The actions taken to improve water quality and restore riparian function include the rapid removal of cattle, the implementation of road management measures, and the implementation of a revised water quality monitoring program. These actions will improve water quality and riparian function in all of the island's streams. These measures will fully comply with the CAO, which directs the Park to abate rangeland and road management practices which degrade riparian habitat, degrade water quality, and induce sediment transport into surface waters of Santa Rosa Island.

Based on the foregoing, implementation of Alternative F would comply fully with applicable NPS laws and regulations. The rapid removal of grazing removes all impacts from grazing, satisfies the special use permit requirements of 36 CFR § 1.6 in that there will be no adverse impact to Park resources, facilities, management responsibilities, or to public health and safety. This alternative also comports with NPS regulations regarding visitor use because visitor access to the island will be expanded under this alternative. The only remaining restrictions on visitor use will be those designed to protect rare species and to ensure safety during hunts and/or deer and elk management activities.

Alternatives D, E and F provide the highest levels of overall resource protection and enhancement,

and are the environmentally preferred alternatives; Alternatives A, B and C provide the lowest levels of protection.

After a thorough consideration of all these factors, the NPS has determined that Alternative F, Negotiated Settlement, is the best alternative for removing the influence of non-native ungulates from the island in an orderly manner and with all due speed, without imposing a substantial hardship on the operation and administration of other Park programs. A rapid removal of cattle and adaptive management of deer and elk will best achieve the goals of the RMP/EIS, while enabling the Park to comply with applicable laws, regulations and policies, and with the terms of the negotiated settlement.

### PUBLIC COMMENTS

During the public comment period for the Draft Supplement to the Final RMP/EIS, the Park received a total of nine comment letters. The substantive comments received focused on several issues. First, some reviewers questioned the adequacy of adaptive management to effectively protect and restore rare plants and their habitats. Second, some reviewers took issue with the Park's proposed use of fire as a management tool. Third, some reviewers were concerned that deer and elk management actions would conflict with visitor use. Last, Vail & Vickers requested that the Draft Supplement be revised to more accurately reflect the terms of the negotiated settlement agreement, that visitors are not permitted to enter buildings or areas traditionally used by Vail & Vickers. In the Final Supplement to the Final RMP/EIS, NPS responded to all substantive comments received on the Draft Supplement.

The Park received no comments on the Final Supplement to the Final RMP/EIS.

## MEASURES TO MINIMIZE HARM

The annual monitoring of selected indicator species and their habitats and the potential reduction of deer and elk under the adaptive management program comprise mitigation measures to protect and foster recovery of rare species and their habitats.

To ensure visitor safety, the Park will control visitor use and access while ungulate removal is occurring. NPS will also oversee removal activities to insure that there are no unacceptable impacts to other resources from vehicle use, etc. Therefore, NPS will require the permittee to submit a detailed removal plan, with timetable, subject to NPS approval. NPS staff will be on hand to oversee removal activities.

To avoid impacts to listed and proposed species, the Park will implement any mitigation measures derived through consultation and conferencing with USFWS.

The Park will continue to monitor water quality in Santa Rosa's streams. If the Park's water quality monitoring program reveals problems due to deer or elk, Vail & Vickers will implement best management practices (BMP's) to achieve water quality standards. Likewise, if the monitoring program reveals water quality problems due to road management practices, NPS will implement BMP's for road management as mitigation measures.

In order to keep horses away from sensitive resource areas in Old Ranch Pasture, Vail & Vickers will place salt and molasses blocks in areas designated by NPS. If the NPS determines that passive

means of keeping the horses away from sensitive resources are ineffective, Vail & Vickers and NPS will cooperate in construction of fencing to prevent horses from accessing sensitive resource areas.

In order to avoid damage to soils and vegetation from off-road vehicle use associated with deer and elk hunts, the Park has identified areas on Santa Rosa Island where off-road driving is prohibited.

## **CONCLUSION**

The above factors and considerations warrant the selection of the Proposed Action, Alternative F, Negotiated Settlement. The actions contained in the Proposed Action will be incorporated into a new special use permit for the hunting operation. This new permit will become effective, and the Proposed Actions will be implemented, as soon as possible after the date of this Record of Decision.

APPROVED:

DATE:

Regional Director, Pacific West Region